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June 20, 2017

Judge Andrew L. Carter, Jr.

Chambers

United States District Court Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

ALCarterNYSDChambers@nysd.uscourts.gov and ECF

RE: United States v. Halberstam
1:15-CR-00825 (ALC)
Request for Adjournment
Current date: 6/26/17 @ 2:00 p.m.

Your Honor:

Please receive this letter as a request for an adjournment of Monday's appearance. I have again reviewed your individual rules to assure I am in compliance. The Government does not oppose this request but would like a date to finalize this matter. I regret that I must ask for another adjournment but I will be in trial on Monday and Dr. Krueger has been consulting in many matters thus his report are yet to be received. There were extensive delays in this matter as the agent had been unavailable for a good portion of time and I had been engaged in a five month trial followed by trials of two months and a number of 4-6 week trials.

The requested adjournment is to an early September date to permit the Government to review the defense submissions. The psychiatric report remains outstanding and is critical to an understanding of this man and this matter.

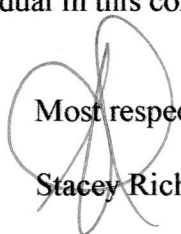
It is anticipated there will be a resolution in this matter without a trial. It is critical for the Government and the Court to understand the psychology of this matter as atypical and not one in the general corridor of similarly charged matters.

There have been a number of previous adjournments:
December 17, 2015 from 10:45 a.m. to 3:00 p.m.; March 3, 2016 to April 12, 2016; April 12, 2016 to May 13, 2016; August 1, 2016 to September 6, 2016; January 9, 2017 to March 17, 2017; and March 17, 2017 to April 3, 2017 (adjournment by the Court due to a conflict with the Court's calendar).

This matter is psychologically complex and I am seeking to demonstrate to the Government why the mandatory minimums in this matter are draconian in this instance.

The defense agrees that time under the Speed Trial Act should be excluded for this adjournment as well.

It is my goal to serve Mr. Halberstam as an individual in this complex situation and I hope for the Court's further grace in this matter.



Most respectfully,

Stacey Richman

cc:

AUSA Andrew Beaty
Andrew.beaty@usdoj.gov and ECF